

Rev. Rul. 2001-2

In Rev. Rul. 90-60, 1990-2 C.B. 4, the Internal Revenue Service provided guidance to taxpayers concerning the general

methodology used by the Treasury Department in computing the bond factor amounts used in calculating the amount of bond considered satisfactory by the Secretary under § 42(j)(6) of the Internal Revenue Code. It further announced that the Secretary would publish in the Internal Revenue Bulletin a table of "bond factor" amounts for dispositions occurring during each calendar month.

This revenue ruling provides in Table 1 the bond factor amounts for calculating the amount of bond considered satisfactory under § 42(j)(6) for dispositions of qualified low-income buildings or interests therein during the period October through December 2000. Table 1 also provides a summary of the bond factor amounts for dispositions occurring during the period January through September 2000. Table 2 provides a summary of bond factor amounts for dispositions occurring during the period January through December 1999. Table 3 provides a summary of the bond factor amounts for dispositions occurring during the period January through December 1998.

Due to a miscalculation, Rev. Rul. 98-13, 1998-1 C.B. 686; Rev. Rul. 98-31, 1998-1 C.B. 1269; Rev. Rul. 98-45, 1998-2 C.B. 364; and Rev. Rul. 99-1, 1999-1 C.B. 265, are in error regarding the specific bond factor amounts for buildings placed in service in calendar year 1987 and disposed of in calendar year 1998. Further, Rev. Rul. 99-18, 1999-1 C.B. 868; Rev. Rul. 99-24,

1999-1 C.B. 1096; Rev. Rul. 99-38, 1999-2 C.B. 335; Rev. Rul. 99-54, 1999-2 C.B. 675; Rev. Rul. 2000-22, 2000-16 I.R.B. 880; and Rev. Rul. 2000-31, 2000-26 I.R.B. 1269, are in error regarding the bond factor amounts for buildings placed in service in calendar years 1987 through 2000 and disposed of in calendar year 1999 and January 2000 through June 2000. The present revenue ruling provides a complete list of the corrected bond factor amounts.

Under the authority of § 7805(b), taxpayers that posted bonds and taxpayers that established Treasury Direct Accounts with the Service pursuant to Rev. Proc. 99-11, 1999-1 C.B. 275, based upon the above mentioned bond factor amounts may continue to rely on those figures. Taxpayers that choose to amend their previously posted bonds by using the corrected bond factor amounts listed in this revenue ruling may do so by submitting an amended Form 8693, *Low-Income Housing Tax Credit Disposition Bond*, to the Internal Revenue Service Center, Philadelphia, PA 19255. The amended form may be submitted by either the taxpayer or the surety. Taxpayers that choose to amend the amount of securities pledged in their previously established Treasury Direct Accounts with the Service by using the corrected bond factor amounts listed in this revenue ruling should contact the Bureau of the Public Debt, Division of Customer Service, IRS Collateral Desk at (304) 480-6158 for further information.

Table 1
Rev. Rul. 2001-2
Monthly Bond Factor Amounts for Dispositions Expressed
As a Percentage of Total Credits

Calendar Year Building Placed in Service
or, if Section 42(f)(1) Election Was Made,
the Succeeding Calendar Year

| Month of Disposition | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | 2000 |
|----------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|--------|--------|--------|--------|
| Jan '00 | 37.59 | 51.81 | 63.64 | 73.62 | 75.52 | 77.92 | 80.36 | 82.70 | 85.05 | 87.63 | 90.38 | 93.52 | 96.69 | 97.21 |
| Feb '00 | 37.59 | 51.81 | 63.64 | 73.62 | 75.31 | 77.69 | 80.12 | 82.44 | 84.78 | 87.35 | 90.08 | 93.17 | 96.26 | 97.21 |
| Mar '00 | 37.59 | 51.81 | 63.64 | 73.62 | 75.09 | 77.47 | 79.88 | 82.20 | 84.53 | 87.07 | 89.79 | 92.85 | 95.88 | 97.21 |
| Apr '00 | 39.75 | 54.78 | 67.30 | 77.84 | 79.96 | 83.31 | 86.76 | 90.16 | 93.64 | 97.41 | 101.43 | 105.89 | 110.31 | 112.52 |
| May '00 | 39.75 | 54.78 | 67.30 | 77.84 | 79.74 | 83.07 | 86.51 | 89.90 | 93.36 | 97.12 | 101.11 | 105.54 | 109.93 | 112.52 |
| Jun '00 | 39.75 | 54.78 | 67.30 | 77.84 | 79.52 | 82.84 | 86.26 | 89.64 | 93.09 | 96.83 | 100.81 | 105.22 | 109.59 | 112.52 |
| Jul '00 | 39.75 | 54.78 | 67.30 | 77.84 | 79.31 | 82.61 | 86.02 | 89.38 | 92.82 | 96.56 | 100.53 | 104.92 | 109.29 | 112.52 |

Table 1 (cont'd)
Rev. Rul. 2001-2
Monthly Bond Factor Amounts for Dispositions Expressed
As a Percentage of Total Credits

| | | Calendar Year Building Placed in Service or, if Section 42(f)(1) Election Was Made, the Succeeding Calendar Year | | | | | | | | | | | | |
|-------------------------|-------|--|-------|-------|-------|-------|-------|-------|-------|-------|--------|--------|--------|--------|
| Month of Disposition | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | 2000 |
| Aug '00 | 39.75 | 54.78 | 67.30 | 77.84 | 79.09 | 82.39 | 85.78 | 89.14 | 92.57 | 96.29 | 100.25 | 104.64 | 109.02 | 112.52 |
| Sep '00 | 39.75 | 54.78 | 67.30 | 77.84 | 78.89 | 82.17 | 85.55 | 88.89 | 92.32 | 96.04 | 99.99 | 104.37 | 108.77 | 112.52 |
| Oct '00 | 39.75 | 54.78 | 67.30 | 77.84 | 78.68 | 81.95 | 85.32 | 88.66 | 92.08 | 95.79 | 99.74 | 104.12 | 108.55 | 112.52 |
| Nov '00 | 39.75 | 54.78 | 67.30 | 77.84 | 78.48 | 81.74 | 85.10 | 88.43 | 91.84 | 95.55 | 99.50 | 103.89 | 108.35 | 112.52 |
| Dec '00 | 39.75 | 54.78 | 67.30 | 77.84 | 78.28 | 81.54 | 84.88 | 88.21 | 91.61 | 95.32 | 99.28 | 103.66 | 108.16 | 112.52 |

Table 2
Rev. Rul. 2001-2
Monthly Bond Factor Amounts for Dispositions Expressed
As a Percentage of Total Credits

| | | Calendar Year Building Placed in Service or, if Section 42(f)(1) Election Was Made, the Succeeding Calendar Year | | | | | | | | | | | | |
|-------------------------|-------|--|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|--|
| Month of Disposition | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | 1999 | |
| Jan '99 | 49.72 | 60.91 | 70.15 | 70.99 | 72.34 | 73.94 | 75.54 | 76.98 | 78.38 | 79.94 | 81.59 | 83.60 | 83.98 | |
| Feb '99 | 49.72 | 60.91 | 70.15 | 70.79 | 72.13 | 73.72 | 75.31 | 76.75 | 78.13 | 79.68 | 81.32 | 83.28 | 83.98 | |
| Mar '99 | 49.72 | 60.91 | 70.15 | 70.60 | 71.93 | 73.51 | 75.09 | 76.52 | 77.90 | 79.44 | 81.07 | 83.00 | 83.98 | |
| Apr '99 | 52.57 | 64.41 | 74.17 | 75.18 | 77.36 | 79.85 | 82.37 | 84.77 | 87.15 | 89.75 | 92.48 | 95.53 | 97.21 | |
| May '99 | 52.57 | 64.41 | 74.17 | 74.97 | 77.14 | 79.62 | 82.13 | 84.52 | 86.90 | 89.49 | 92.20 | 95.25 | 97.21 | |
| Jun '99 | 52.57 | 64.41 | 74.17 | 74.77 | 76.93 | 79.39 | 81.89 | 84.28 | 86.65 | 89.23 | 91.95 | 94.99 | 97.21 | |
| Jul '99 | 52.57 | 64.41 | 74.17 | 74.57 | 76.72 | 79.18 | 81.67 | 84.04 | 86.41 | 88.99 | 91.71 | 94.76 | 97.21 | |
| Aug '99 | 52.57 | 64.41 | 74.17 | 74.37 | 76.52 | 78.96 | 81.44 | 83.81 | 86.18 | 88.76 | 91.48 | 94.55 | 97.21 | |
| Sep '99 | 52.57 | 64.41 | 74.17 | 74.18 | 76.32 | 78.75 | 81.23 | 83.59 | 85.95 | 88.54 | 91.27 | 94.37 | 97.21 | |
| Oct '99 | 52.57 | 64.41 | 74.17 | 73.99 | 76.12 | 78.55 | 81.02 | 83.37 | 85.74 | 88.32 | 91.07 | 94.20 | 97.21 | |
| Nov '99 | 52.57 | 64.41 | 74.17 | 73.80 | 75.93 | 78.35 | 80.81 | 83.17 | 85.53 | 88.12 | 90.88 | 94.04 | 97.21 | |
| Dec '99 | 52.57 | 64.41 | 74.17 | 73.62 | 75.74 | 78.15 | 80.61 | 82.96 | 85.33 | 87.93 | 90.71 | 93.90 | 97.21 | |

Table 3
Rev. Rul. 2001-2
Monthly Bond Factor Amounts for Dispositions Expressed
As a Percentage of Total Credits

| | | Calendar Year Building Placed in Service or, if Section 42(f)(1) Election Was Made, the Succeeding Calendar Year | | | | | | | | | | | | |
|-------------------------|-------|--|-------|-------|-------|-------|-------|-------|--------|--------|--------|--------|--|--|
| Month of Disposition | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 | | |
| Jan '98 | 69.28 | 79.57 | 81.84 | 84.75 | 88.14 | 91.97 | 95.92 | 99.75 | 103.57 | 107.70 | 111.85 | 112.52 | | |
| Feb '98 | 69.28 | 79.57 | 81.59 | 84.49 | 87.86 | 91.67 | 95.59 | 99.39 | 103.18 | 107.25 | 111.28 | 112.52 | | |
| Mar '98 | 69.28 | 79.57 | 81.35 | 84.24 | 87.59 | 91.37 | 95.27 | 99.04 | 102.80 | 106.83 | 110.79 | 112.52 | | |
| Apr '98 | 65.52 | 75.25 | 75.96 | 77.87 | 80.16 | 82.79 | 85.46 | 87.97 | 90.41 | 93.03 | 95.60 | 97.21 | | |
| May '98 | 65.52 | 75.25 | 75.75 | 77.65 | 79.93 | 82.55 | 85.20 | 87.69 | 90.12 | 92.74 | 95.31 | 97.21 | | |

Table 3 (cont'd)
Rev. Rul. 2001-2
Monthly Bond Factor Amounts for Dispositions Expressed
As a Percentage of Total Credits

Calendar Year Building Placed in Service
or, if Section 42(f)(1) Election Was Made,
the Succeeding Calendar Year

| Month of Disposition | 1987 | 1988 | 1989 | 1990 | 1991 | 1992 | 1993 | 1994 | 1995 | 1996 | 1997 | 1998 |
|-------------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Jun '98 | 65.52 | 75.25 | 75.54 | 77.44 | 79.71 | 82.31 | 84.95 | 87.43 | 89.85 | 92.46 | 95.05 | 97.21 |
| Jul '98 | 65.52 | 75.25 | 75.33 | 77.22 | 79.49 | 82.08 | 84.70 | 87.18 | 89.60 | 92.21 | 94.81 | 97.21 |
| Aug '98 | 65.52 | 75.25 | 75.13 | 77.01 | 79.27 | 81.85 | 84.47 | 86.93 | 89.35 | 91.97 | 94.61 | 97.21 |
| Sep '98 | 65.52 | 75.25 | 74.93 | 76.81 | 79.06 | 81.63 | 84.23 | 86.70 | 89.12 | 91.74 | 94.42 | 97.21 |
| Oct '98 | 65.52 | 75.25 | 74.73 | 76.61 | 78.85 | 81.41 | 84.01 | 86.47 | 88.89 | 91.53 | 94.25 | 97.21 |
| Nov '98 | 65.52 | 75.25 | 74.54 | 76.41 | 78.65 | 81.20 | 83.79 | 86.25 | 88.68 | 91.33 | 94.09 | 97.21 |
| Dec '98 | 65.52 | 75.25 | 74.35 | 76.22 | 78.45 | 80.99 | 83.58 | 86.04 | 88.47 | 91.14 | 93.94 | 97.21 |

For a list of bond factor amounts applicable to dispositions occurring during other calendar years, see Rev. Rul. 98-3, 1998-1 C.B. 248.

EFFECT ON OTHER REVENUE RULINGS

Rev. Rul. 98-13, 1998-1 C.B. 686; Rev. Rul. 98-31, 1998-1 C.B. 1269; Rev. Rul. 98-45, 1998-2 C.B. 364; Rev. Rul. 99-1, 1999-1 C.B. 265; Rev. Rul. 99-18, 1999-1 C.B. 868; Rev. Rul. 99-24, 1999-1 C.B. 1096; Rev. Rul. 99-38, 1999-36 I.R.B. 335; Rev. Rul. 99-54, 1999-51 I.R.B. 675; Rev. Rul. 2000-22, 2000-16 I.R.B. 880; Rev. Rul. 2000-31, 2000-26 I.R.B. 1269; and Rev. Rul. 2000-48, 2000-42 I.R.B. 349, are revoked.

DRAFTING INFORMATION

The principal author of this revenue ruling is Gregory N. Doran of the Office of Associate Chief Counsel (Passthroughs and Special Industries). For further information regarding this revenue ruling, contact Mr. Doran at (202) 622-3040 (not a toll-free call).

Section 3221.—Rate of Tax

Determination of Quarterly Rate of Excise Tax for Railroad Retirement Supplemental Annuity Program

In accordance with directions in section 3221(c) of the Railroad Retirement Tax Act (26 U.S.C., 3221(c)), the Railroad Retirement Board has determined that the excise tax imposed by such section 3221(c) on every employer, with respect to having individuals in his employ, for each work-hour for which compensation is paid by such employer for services rendered to him during the quarter beginning January 1, 2001, shall be at the rate of 26 cents.

In accordance with directions in section 15(a) of the Railroad Retirement Act of 1974, the Railroad Retirement Board has determined that for the quarter beginning January 1, 2001, 39.7 percent of the taxes collected under sections 3221(b) and 3221(c) of the Railroad Retirement Tax Act shall be credited to the Railroad Retirement Account and 60.3 percent of the taxes collected under such sections 3211(b) and 3221(c) plus 100 percent of the taxes collected under section 3221(d) of the Railroad Retirement Tax Act shall be credited to the Railroad Retirement Supplemental Account.

Dated December 1, 2000.

By Authority of the Board.

Beatrice Ezerski,
Secretary to the Board.

(Filed by the Office of the Federal Register on December 12, 2000, 8:45 a.m., and published in the issue of the Federal Register for December 13, 2000, 65 F.R. 77938)
